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* CLERK US DISTRICT COURT
* ALEXANDRIA, VIRGINIA

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* **Case No.:** 1-10CV681
*
* LMB/TRJ
*

RAMI FATHI ABBAS
14622 General Washington Drive
Woodbridge, Virginia 22193

COMES NOW the Plaintiff Silwal Singh Dhruba ("Dhruba"), by and through the undersigned counsel, and files this Complaint against Defendant Virginia Uniformed Securities Service, Inc. ("Security Services"), and Rami Fathi Abbas, and alleges as follows:

1. This Court has subject matter jurisdiction over this matter, as conferred on this Court by 28 U.S.C. § 1331, as this Complaint raises a federal question arising from §§ 206 and 207 of the Fair Labor Standards Act, 29 U.S.C. §§ 201-219 (2008) (“FLSA”).

2. This Court has in personam jurisdiction over the Defendants, since they all reside or transact business in the Eastern District of Virginia and are found within the Eastern District of Virginia.

Venue

3. Venue is proper as to all parties since they all reside or transact business within the Eastern District of Virginia.

Parties

4. Plaintiff Silwal Singh Dhruba is an individual resident of Virginia who is employed in this District by the Defendants. Dhruba was hired by Security Services to work as a security guard, and would be paid directly by Security Services.

5. Defendant Security Services is a Virginia corporation, authorized to do business in Virginia, District of Columbia, and Maryland, and has done business in Virginia during all times material hereto. Upon information and belief, all of Plaintiff's paychecks were issued by Security Service.

6. Defendant, Rami Fathi Abbas, is the registered agent, sole director and officer of Security Services. Defendant, Rami Fathi Abbas, directed, and oversaw the day to day operations, and finances of Security Services.

Statement of Facts

7. At all times hereinafter mentioned, Defendants were engaged in the provision of security services throughout the Mid-Atlantic region, including the Commonwealth of Virginia, Maryland, and the District of Columbia. The provisioning of such services directly affects interstate commerce and Defendants' employees are engaged in such interstate commerce. During the course of his employment, Plaintiff

affected interstate commerce by his actions. The Defendants are responsible for the failure to pay Plaintiff proper regular and overtime wages.

8. From May 2006 to May 2010, Defendants employed Plaintiff as a security guard.

9. Plaintiff's position was non-exempt under the FLSA.

10. Defendants improperly classified Plaintiff as exempt from overtime wages.

11. Plaintiff worked in excess of forty (40) hours per calendar week since May 2006, yet has not been paid the appropriate rate of overtime wages for that period. Defendants were aware that Plaintiff regularly performed work beyond forty hours each week.

12. Defendants condoned and benefited from the performance of such extra work time and never provided a complete and accurate accounting for the hours worked and the payments made.

13. Upon information and belief, Defendants knew of the duty and obligation to pay proper overtime wages for the hours worked in excess of forty (40) hours per work week, and Defendants knowingly failed and refused to follow the lawful requirements. Defendant's acts and omissions constitute willful violations of the FLSA which entitle Plaintiff to liquidated damages for Defendant's willful violations.

WHEREFORE, Plaintiff prays that this Honorable Court grant judgment against the Defendants, on the basis of Defendants' willful violations of the Fair Labor Standards Act, demands judgment against Defendants for: (1) compensatory damages for amounts earned in the nature of regular and overtime pay to which Plaintiff was entitled but did not receive; (2) an equal amount in liquidated damages;

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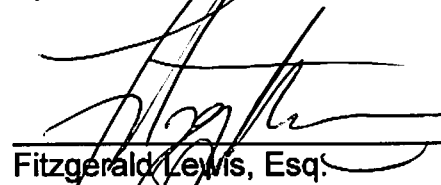
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(3) reasonable attorney's fees and costs of this suit; (4) pre and post judgment interest; and (5) such other and further relief as this Court deems equitable and just.

JURY DEMANDED

WHEREFORE, Plaintiff hereby demands a jury on all issues triable by a jury.

Respectfully submitted,
Silwal Singh Dhruba
By Counsel



Fitzgerald Lewis, Esq.
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